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**VIA ECF**

Hon. Lorna G. Schofield  
United States District Judge  
United States Courthouse  
80 Pearl Street  
New York, New York 10007

March 5, 2018

United States v. Carlos ZAVALA VELASQUEZ  
(S1) 15 Cr. 174 (LGS)

Dear Judge Schofield:

Mr. Zavala is currently scheduled to be sentenced by this Court on March 15, 2018. The Court ordered that defense submissions be filed by March 1, 2018 and the government's pre-sentence submission, if any, is due by today, March 5, 2018. See, Docket #291, Order of the Court dated January 12, 2018.

This letter is respectfully submitted to request a modification to the schedule for pre-sentence submissions.

The reason for the request is that Probation has only today disclosed the PSR and the sentencing recommendation. The recommended sentence is 210 months and the issues presented are numerous. Counsel requires sufficient time in which to review the PSR with Mr. Zavala, to consider how best to proceed and for preparation of our submission to the Court.

Accordingly, we ask the Court to permit us to file our pre-trial submissions early next week. Obviously, we would have no objection to the Court extending the government time in which to submit its reply, if any.

Since the Court must have sufficient time in which to consider the arguments that will be raised, we understand that, as a consequence of granting this request, it is possible that the sentencing date may have to be changed. If so, we ask that the Court not reschedule sentencing during the weeks of April 9 or April 16, as I will be out-of town traveling.

Nonetheless, I apologize for the inconvenience granting this request causes, but remain confident that the Court will understand the need here.

Respectfully submitted,

/s/  
HOWARD LEADER

cc: Emil J. Bove, III, Esq.  
Matthew J. Laroche, Esq.  
Assistants United States Attorney (VIA EMAIL AND ECF)